

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

BRIAN H. ROBB, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

EDUCATION MANAGEMENT
CORPORATION, EDWARD H. WEST,
RANDALL J. KILLEEN, and MICK J.
BEEKHUIZEN,

Defendants.

Case No.: 2:14-cv-01287-DSC

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF THE
SETTLEMENT AND IN SUPPORT OF CERTIFICATION OF SETTLEMENT CLASS,
PLAN OF ALLOCATION, AND AWARD OF ATTORNEYS' FEES AND EXPENSES**

Lead Plaintiff Maurice Shihadi hereby moves this Court for an Order that, *inter alia*, (i) grants final approval to the proposed Settlement; (ii) certifies the Class for settlement purposes only; (iii) approves the Plan of Allocation; (iv) grants Lead Plaintiff's request for an award of attorneys' fees and reimbursement of expenses and for a compensatory award to Lead Plaintiff. In support of this Motion, Lead Plaintiff submits herewith a Memorandum of Law, the Declaration of Michele S. Carino, the Declaration of Pomerantz LLP, the Declaration of Alfred G. Yates, Jr., and all the exhibits annexed thereto, respectively.¹

Dated: January 20, 2016

POMERANTZ LLP

/s/Michele S. Carino

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Liaison Counsel for Plaintiff

Maurice M. Shihadi and the Class

¹ All capitalized terms, unless otherwise defined herein, shall have the meaning set forth in the Stipulation, dated September 16, 2015, which was previously filed with the Court. (Dkt. No. 44).